

## REMARKS

Claims 1-14 were rejected as being unpatentable over a combination of Cook and Johnson. Reconsideration and withdrawal of these rejections are respectfully requested.

The Examiner, in the outstanding Office Action , stated that "The mere arrangement and display of data does not affect the functionality of the underlying method of identifying sales opportunities and is not further limiting".

In response thereto, the applicant's representative has amended the claims to positively recite claimed computer-implemented method steps, using action verbs. It is respectfully submitted that the pending claims do not recite "mere arrangement and display of data" and that the amended claims do, in fact, "affect the functionality of the underlying method of identifying sales opportunities within a territory", as requested by the Examiner.

Support for the formulating, applying and identifying may be found in the specification in paragraphs [0020], [0024], [0025], [0028] , [0032], Figs. 3 and 4 and corresponding written description.

As noted earlier, the Cook/Johnson combination does not teach or suggest the claimed steps of:

formulating a search according to selected ones of a plurality of parameters related to customers in the salesperson's sales network and the products and/or services offered for sale by the salesperson;

applying the search to the central database;

identifying, in results of the applied search, at least the sales opportunities, the customers' install base of products and/or services, the origination information and unknown information that identifies where the sales representative should gather additional install base information, and

providing the results of the search and the identifying step in a tabular worksheet on a computer coupled to the network.

Indeed, Cook shows a plurality of text forms for the salesperson and for the customer to fill out to gather the requisite sales information. In Cook, sales leads are provided to the salespersons via “push technology”, such as email (see reference 46 in Fig. 1). Having received an email of a potential sales lead, the salesperson in Cook can also view the customer lead stored in the lead management database 44 via an intranet, as noted in paragraph [0045], or even generate reports for the purpose of tabulating demographic information and product and/or service features and benefit information. The use of the word “tabulate”, in the context of report generation, would not lead on of ordinary skill in the art to devise the claimed embodiments. Instead, the person of ordinary skill in the art would be naturally led, from the teachings of Cook, to provide a system wherein an email message alerts the salesperson to a potential lead, whereupon the salesperson would log onto the lead management database 44 to generate a report (such as shown in Figs. 2 and 3 of Cook) of the sales lead contained in the email.

Even if the competitor’s product offerings were to be displayed side by side (as taught by Johnson) with the profile of the customer lead according to Cook, the applied combination would still fail to teach or to suggest:

**formulating a search according to selected ones of a plurality of parameters related to customers in the salesperson’s sales network and the products and/or services offered for sale by the salesperson;**

**applying the search to the central database;**

**identifying, in results of the applied search, at least the sales opportunities, the customers’ install base of products and/or services, the origination information and unknown information that identifies where the sales representative should gather additional install base information, and**

**providing the results of the search and the identifying step in a tabular worksheet on a computer coupled to the network.**

...as claimed herein. Indeed, the claimed embodiments would not somehow “emerge” whole cloth from a collective consideration of the teachings of Cook and those of Johnson et al.

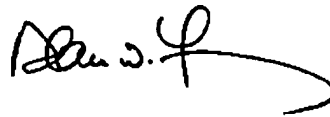
as the applied combination fails to teach or to suggest formulating a search according to selected ones of a plurality of parameters, applying the result of the formulated search to the central database, identifying the sales opportunities, the customers' install base of products and/or services, the origination information and/or the claimed unknown information, and much less providing the results of the searching and identifying steps in a tabular worksheet, as claimed herein and required by the amended claims. In fact, the applied combination actually teaches away from these positively recited steps, as the applied combination relies on email and the generation of (text-based is the only form that is taught) reports, which is antithetical to searching, identifying, applying and providing steps recited in the amended claims.

Claim 8 has been amended to include similar recitations and the arguments above are equally applicable thereto. For the sake of brevity, the arguments presented above are not repeated here.

In view of the foregoing, therefore, it is respectfully submitted that the claimed embodiments are not obvious over the Cook/Johnson reference. Reconsideration and withdrawal of the 35 USC §103(a) rejections are, therefore, respectfully requested.

Applicant's attorney, therefore, respectfully submits the present application is in condition for allowance and passage to issue. If any unresolved issues remain, please contact the undersigned attorney of record at the telephone number indicated below and whatever is needed will be done immediately.

Respectfully submitted,



Date: May 4, 2009

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